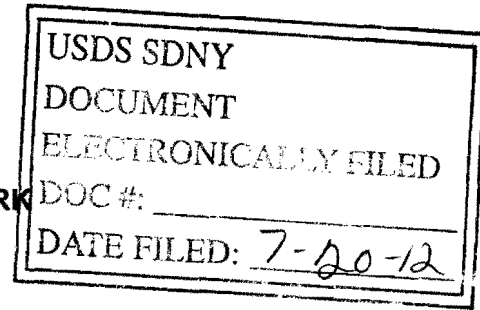


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK



SLEP-TONE ENTERTAINMENT
CORPORATION,

Plaintiff,

v.

KEATS KARAOKE; ALEX NICHOLAS, SING
SING; PLANET ROSE KARAOKE;
JOHN O'REILLY; KARAOKE SHOUT; ALL
GENERATION DJ.COM; PHIL; BIG CITY
KARAOKE; BROOKE EDWARDS; PARTY FOR
A LIFETIME; RYAN BROWN; SPOTLIGHT
ENTERTAINMENT; ALDEN KARAOKE; JOHN
ALDEN; SABRINA ASCH; RICK CONTI;
ROCKIN' RUDY; ABSOLUTE
ENTERTAINMENT; DJ BRAD; OKIE'S
KARAOKE; THOMAS BRUNO; DIGITAL DIVA
ENTERTAINMENT; TARA MICHANS; and
DOES NOS. 1-20, INCLUSIVE, IDENTITIES
UNKNOWN,

Defendants.

CIVIL ACTION FILE NUMBER:

1:11-CV- 04657-PKC

HONORABLE P. KEVIN CASTEL

*Fact discovery
extended to September 28,
2012 and expert discovery
extended to October 30,
2012. Next set October 16 at
12 p.m. SO ORDERED.
[Signature], USDS
7-20-12*

PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO COMPLETE DISCOVERY

Plaintiff Slep-Tone Entertainment Corporation doing business as Sound Choice Studios ("Sound Choice"), by its undersigned counsel, hereby moves the Court pursuant to Fed.R.Civ.P. 6(b) to extend the discovery period in this matter for an additional three (3) months through and including September 30, 2012 (all Fact

Discovery due by September 30th, 2012, all Expert Discovery due by October 30th, 2012). This is our first request for an enlargement of time for this purpose.

A scheduling order was signed on 11/30/2011, by Judge P. Kevin Castel ordering: all Fact Discovery is due by 6/29/2012; all Expert Discovery due by 7/27/2012; Defendants are directed to preserve and refrain from altering, modifying, transferring, disposing or selling any equipment or recording (audio and visual) used in any Karaoke performance without an express written order from the Court; and setting a Case Management Conference for 7/20/2012 at 11:00 AM. Plaintiff submitted rule 26 disclosure on 12/13/2012 and a motion to voluntarily dismiss several Defendants. Plaintiff's attorney has tried to contact Defendant's attorneys on June 27th and June 28th for consent to an extended discovery period but has been unable to reach the parties. However, Plaintiff's attorney has no reason to believe they oppose the extension of time to complete discovery.

The extended discovery period is needed for the following reasons:

1. The current discovery period is scheduled to close on June 29th, 2012.
2. Plaintiff needs additional time to gather necessary discovery documents and schedule depositions.
3. Initial Disclosures per Rule 26(a)(1)(A) has not been submitted by Defendants remaining in the case.
4. A three (3) months extension will not prejudice any of the parties. The extension is being requested so that the parties may complete the discovery that they have been unable to conduct thus far. The extension is not being

sought for any purpose contrary to the Federal Rules of Civil Procedure or the Local Rules of this Court.

For these reasons, the parties respectfully request that the Court issue an Order extending the discovery period in this matter for three (3) months, through and including September 30th, 2012 (all Fact Discovery due by September 30th, 2012, all Expert Discovery due by October 30th, 2012). A proposed Order is attached hereto for this Court's convenience.

Dated: Rochester, NY
June 28, 2012

/s/Susan J. Michel
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